

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re

REYNALDO VINLUAN,

Debtor.

No. 17-14070

DECLARATION IN SUPPORT OF *EX*
PARTE MOTION FOR 2004
EXAMINATION

Kathryn A. Ellis declares and states as follows:

1. I am the attorney for the Chapter 7 Trustee herein, have testimonial knowledge of the facts set forth in this declaration and am competent to testify thereto. This declaration is made in support of the Trustee's request for a 2004 examination of LCS Financial Services Corporation.

2. The Trustee is investigating the validity of the underlying debt for the second position lien given the lender's failure to enforce the same for over six years.

3. In accordance with the above, the Court is requested to allow the examination of LCS Financial Services Corporation pursuant to BR 2004.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE
STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.

Dated this 24th day of January, 2018 at Seattle, Washington.

/s/ Kathryn A. Ellis

Kathryn A. Ellis

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**DECLARATION IN SUPPORT OF *EX PARTE*
MOTION FOR 2004 EXAMINATION - 1**

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